Appl. No. 09/648,908
Response dated June 18, 2004
Reply to Office Action of May 19, 2004

PATENT

REMARKS

Applicants respectfully request the Examiner consider the following remarks. No claims have been added, amended, or canceled. Hence, claims 1-29 remain pending in the application.

Claim Rejections

The Office Action has rejected claims 1-2, 4-6, 8-11 and 18-24 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,108,540 to Sonti et al. (hereinafter "Sonti") in view of U.S. Patent No. 6,584,312 to Morin et al. (hereinafter "Morin"). Claims 3, 7, 12-17 and 25-29 have been rejected over various combinations of Sonti/Morin in further view of U.S. Patent No. 6,393,271 to Dougherty (hereinafter "Dougherty"), U.S. Patent No. 5,958,016 to Chang et al. (hereinafter "Chang"), U.S. Patent No. 5,913,165 to Foti (hereinafter "Foti"), or U.S. Patent No. 6,099,796 to Cianfrocca et al. (hereinafter "Cianfrocca"). All pending claims have been rejected under § 103 as unpatentable over the combination of Sonti and Morin, along with, in some cases, other references.

Applicants thank the Examiner for the careful consideration of the remarks previously presented by Applicants. Even after consideration of the remarks in the office action, Applicants still believe that the claims are allowable for the reasons discussed below. Thus, Applicants respectfully traverse the rejections as the cited references, either alone or in combination, fail to teach or suggest the recitations of the claims pending in the application.

The office action states that the HLR in Morin automatically updates a profile without prompting from the MSC. Even if true, Applicants still respectfully submit that Morin (and any of the other cited references, alone or in combination) fail to teach or suggest the recitation in claim 1 of "without prompting by any Switching Center, sending the profile update to the Switching Center." In Morin, the mobile switching center (MSC) "sends a profile request message requesting the HLR to transmit the subscriber profile associated with the MS." Morin at col. 4, ll. 40-43. Morin does disclose that the HLR may modify the profile before sending it to the MS, but the profile is only sent in response to the Switching Center sending the request

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message. Thus, in contrast to claim 1, the profile update is not <u>sent</u> without prompting by any Switching Center.

Additionally, claim 1 recites "generating a request to the Service Location Register" to send a profile update for the subscriber to a Switching Center." Sonti teaches that a subscriber can dial a profile service number (PSN) to request a profile change. <u>Sonti</u>, col. 8, ll. 25-32. However, the only request generated to the HLR (equated with the Switching Center of claim 1) is done by the MSC. <u>Id.</u> at col. 8, ll. 40-44. Applicants' understanding is that these teachings were relied upon to teach the recitation of claim 1 of "generating a request to the Service Location Register to send a profile update." Thus, Applicants respectfully submit that the additional recitation of claim 1 of "in response to the request and without any prompting by any Switching Center, sending the profile update" cannot be taught or suggested by Morin or Sonti as the request was generated by the MSC.

The other cited references also fail to teach or suggest the recitations of claim 1 discussed above. Therefore, Applicants respectfully submit claim 1 is allowable. Claims 5, 6, 23, 26, and 28 contain recitations similar to those discussed above with reference to claim 1 and are believed to be allowable for at least the same reasons. The remaining claims depend directly or indirectly on one of claims 1, 5, 6, 23, 26, and 28 and are accordingly also believed to be allowable for at least the same reasons.

Applicants respectfully submit that these claims are also allowable for additional reasons. For instance, claim 5 recites that a stored procedure is initiated in a database that received a change in a subscriber profile. The stored procedure is initiated to generate a request to the HLR to send a qualification directive to an MSC. As stated by the office action, Sonti and Morin do not disclose stored procedures. Instead, official notice is relied upon to disclose initiating a stored procedure to generate a request to the HLR. Applicants respectfully object to the official notice and request an express showing of documentary proof of these propositions as set forth in MPEP 2144.03. Additionally, the only mention in Morin and Sonti of generating a request to the HLR to send a qualification directive is done by an MSC, not by a database which received an update regarding a change in a subscriber profile. In fact, Morin explicitly states that the subscriber profile is not updated. <u>Morin</u>, col. 4, ll. 55-59, col. 5, ll. 33-35. Thus, Applicants

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respectfully submit that the references fail to teach or suggest "initiating a stored procedure in the database to generate a request to the HLR to send a qualification directive to an MSC."

Claims 6, 10, 11, 26, and 28 are also believed to be additionally allowable for reasons similar to claim 5. Claim 6 recites "a database configured to receive an update regarding a change in the subscriber's profile and generate a request to the Service Location Register to send a profile update to a Switching Center." Claim 10 depends on claim 6 and further recites that the request generated by the database is a qualification directive. Claim 11 depends on claim 1 and recites that generating a request to the Service Location Register to send a profile update comprises initiating a stored procedure in the database. Claims 26 and 28 contain recitations similar to claim 6. As previously discussed with reference to claim 5, in Morin and Sonti the request is generated by the MSC, not by a database (or by a stored procedure in a database) which received an update regarding a change in subscriber profile. Accordingly, Applicants respectfully submit that these claims are also allowable for these additional reasons.

Applicants also believe that claims 20, 21, and 22 are also allowable for additional reasons. Claim 20 recites that the request in claim 1 is generated in response to an update received at a database regarding a change in the subscriber profile. Thus, in claim 20, the sequence is 1) an update is received at a database regarding a change in subscriber profile; 2) in response to the update, a request is generated to the Service Location Register to send a profile update for the subscriber to a Switching Center; and 3) in response to the request and without prompting by any Switching Center, sending the profile update to the Switching Center. Applicants respectfully submit that none of the references cited disclose sending a profile update to a Switching Center in response to a request generated in response to an update at a database. In fact, as previously discussed, in Morin, the HLR database is not even updated. Morin, col. 4, ll. 55-59, col. 5, ll. 33-35. Claims 21 and 22 also recite that the request is generated (or the stored procedure is initiated to generate the request) in response to the update at the database. As the cited references fail to disclose these recitations, Applicants respectfully submit that claims 20, 21, and 22 are also allowable for these additional reasons.

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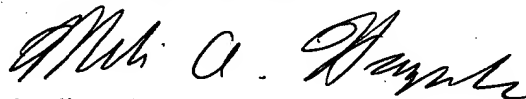Reply to Office Action of May 19, 2004

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REQUEST FOR A TELEPHONE INTERVIEW

If there remains any issues of allowance with this application, the Applicants earnestly request the Examiner telephone the undersigned at 303-571-4000.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

Respectfully submitted,

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